

CIVIL RIGHTS COMPLAINT PURSUANT TO 42 U.S.C. § 1983

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

JUN 11 2015

JAMES N. HATTEN, Clerk
By: *Caryl Davis*

Brandon Ray Young 1004623
(Enter above the full name and prisoner
identification number of the plaintiff.) Elec. Stamp ID
1060868753

vs.

CIVIL ACTION NO.

1:15-CV-1372-LMM-AJB

Georgia Department of Corrections
Unit Manager Kevin Davis Corrections Officer
Deltonia Scott, Tarvis Knight And Eddie King
(Enter above the full name of the defendant(s).)

I. Previous Lawsuits

- A. Have you begun other lawsuits in state or federal court dealing with (1) the same facts involved in this action, or (2) otherwise relating to your imprisonment?

Yes (/) No ()

- B. If you answer to A(1) or (2) is yes, describe each lawsuit in the space below and tell us whether the "old" case involves the same facts or other issues. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s): Brandon Ray Young

Defendant(s): Georgia Department of Corrections, Kevin Davis
Deltonia Scott, Tarvis Knight, Eddie King

2. Court (if federal court, name the district; if state court, name the county):

U.S. District Court
Northern District of Georgia

3. Docket Number: 4

III. Previous Lawsuits (Cont'd)

4. Name of judge to whom case was assigned: Alan J. Baverman
5. Did the previous case involve the same facts:
Yes (/) No ()
6. Disposition (Was the case dismissed? Was it appealed? Is it still pending?):
pending a financial affidavit seeking leave to
proceed in forma pauperis
7. Approximate date of filing lawsuit: 2/12/2015
8. Approximate date of disposition: TBD To Be Determined

II. Exhaustion of Administrative Remedies

- A. Place of Present Confinement: Hays State Prison
- B. Is there a prisoner grievance procedure in this institution?
Yes (/) No ()
- C. Did you present the facts relating to your complaint in the state prisoner grievance procedure?
Yes (\) No ()
- D. If your answer is YES:
1. What steps did you take and what were the results?
Filed A formal grievance on Blue construction paper handed
to Mr. William Autry in front of Regional Inspection team
from J-1108 housing, to wit warden ALAN CARTER and Mr.
Steve Upton, Deputy Warden Security Terry Jefferson, Admin. Warden
Ragsby
2. If your answer is NO, explain why not: _____

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

- A. Name of Plaintiff(s): Brandon Ray Young
Forest Hays Tr. State Prison
777 UNDERWOOD DRIVE PO Box 1468
Trion Georgia 30753

III. Parties (Cont'd)

Address(es): _____

(In item B below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Do the same for each additional defendant, if any.)

B. Defendant(s): ^{Georgia} Department of Corrections, Unit Manager Kevin Davis
Correctional Officers Eddie King, Tarvious Knight, Deltonio
Scott

Employed as: Administrative Staff and Corrections Officials

at Jimmy Antray State Prison

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

I. ON Friday December 27th 2013, Unit Manager Kevin Davis approached the window panel of Door 202 J-1 Dormitory of Antray State Prison at approximately 0825 AM Est. time and ask Brandon Roy Young #1004623 "Why I was not Dressed properly for inspection"

II. I had just lost my closest immediate family member someone that under mutual agreement was my caretaker while behind bars and some one who settled finances while I was away. By this being someone whom I depended and relied on so heavily to be responsible with the things I had edowed to her over the years all I had to bite down on was a daily devotional. This Being the Grand Mother passed September 6th 2013 at approximately 2106 hours central time. While at the study area of assigned cell my reply was first thought "Do we eat lunch today"? Kevin Davis reply was "No" and I replied that I was not aware of any inspection ON Friday, Sir."

III. He (Mr. Davis) slammed the window panel shut and said, he was going to show my God Damned Ass today and continued to curse and Hollar loudly when walking away afterwards I was showered and given time outside as normal activity for J-1 Housing Unit resumed. At approximately 1515 Est hrs Officer Eddie King gave me my evening meal of pulled chicken mixed vegetables and Biscuits rice Green Beans and Spice Kake.

IV. Shortly afterwards officer Scott came to the Room Cell 202 J-1 requesting that I put up, I ask him where we were going he said in short reference just come and cuff up and I attempted

- IV. Statement of Claim (Cont'd) [Violating my 10th amendment right] in handcuffs to finish eating the evening meal. When Mr. Davis and Officer Scott, King, and Knight opened my Door (already afraid from threats earlier) and entered the cell at this time I was told to cuff up and followed as instructed and Kevin Davis decided he wanted to punch me from behind in the neck and start bellowing in a loud voice as if I was refusing though instead I was being stretched out over the Bunk and repeatedly hit and struck with a large can of OC spray with a handle on it by Mr. Davis this action was striking in a Downward motion as if repeatedly stabbing me, while Officer Scott Choked me, and Eddie King gave me kidney punches to the Back and Knight shackled my feet I was then taken from Cell 202 J-1 escorted across the floor to J-2 side Cell 127 believed, "Don't know have problems when my memory don't serve me right" there the Beat Down continued My clothing a sweatshirt and Pajama Bottoms were taken down from my waist area and sweater stretched over my head with both shackles and cuffs still attached and Kevin Davis screaming give me the fucking clothes when my Arms and Legs was Damn near pulled in half by Officer King, Knight, and Scott hold me while Davis also yanked and pulled, Before being left Naked on strip cell for the night During Relief the packing of my personal property things came up missing and damaged. on January 8th State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes. Kenneth Wesley JDC by unknown source of intel forced plaintiff into a deadly stabbing Autry State Prison by Flores in H-1 suspected association of Jose Calderon. HCCI Division and a on going war.
- V. ^{about Mr Davis released me from J-1 to H-1 with knowledge from a senior official HCCP}

I. A full medical check up Head to feet, lab medical coverage professional healthcare with friendly helpful and reliable nurse staff plus physical therapy meds and healthy meals a considerate amount of light. Has been loss since admittance back to the State 2/2012

II. Petitioner Change of condition a mandamus will follow when suit matures (Amicus curiae)

III. Cancellation of Kevin Davis' cash arrangement preferably 40k and medical insurance company settlement certiorari upon scrivener CAS Fortuit

IV. Moral absolutism abalienation abnormare request for production and required-records doctrine in-limine an act Chamber of Commerce and change of venue and invoke cooling-off period while the Chamberlain and the

Chamber of accounts contacted and Chamber business conducted while plaintiff fully understands moral conduct and progressive seating along with familiarizing himself with the courthouse and rules governing them while an equal investigation can be launched into the Defendants for it may pertain to a larger problem and possibly a hate crime. abatement ask on this along with judgment

V. A Seizure of material and/or collateral cash equivalent doctrine filed by all involved including and Forsake Lt. Alexander

VI. The plaintiff petitions and wishes that Kevin Davis be require to pay the amount of \$36,223 dollars for medical damage plus 9,998 dollars and twenty two cent for punitive and racially motivated discriminatory clause plus forfeiture of property.

VII. Petitioner Demands \$33,123 dollars 246cent for his participation these are on a cash budget and incremental cash flow for slanderous remarks

VIII. Mandamus of ONE Hundred fifty six trillion two hundred seventeen Billion ONE HUNDRED eighty five million, six Hundred and thirty two thousand, nine hundred ninety six dollars and twenty four cents to compensate to include required medical expenses plus a cash-transaction report of All GCI and Georgia Department of Corrections cash value between the years of 1994 untill present as in today a year, a day, and a waste plus fiscal years Mutual Fund, common stock fund, income fund, international fund, Lead Fund along with a repurchase agreement, utility fund and all employee W-4 forms turned over to petitioner along with privileged communications with freedom information privacy act. invoked

a cash book, a cash budget along with its cash cycle. For an alleged Racial discriminated crime, additional care given plus all media and phone records and companies rights surrendered and negotiated with petitioner according to zone of danger rule, zone of employment, zone of interests, aesthetic zoning, and conditional zoning need to apply along with incentive zoning, plus a discounted cash flow plan. Plus lifetime ~~health~~ coverage medical, homeowners, and property insurance along 24 hour around the clock video and audio surveillance and a discriminatory

V. Relief (Cont'd) committee aligned formed along with a Board of Commissioners to fix and not pollute the schooling of those who earn a living. Operations and prescription tax deductible taken care of.

IX. Eddie King prosecuted to the full extent of the Law allows for the same crimes that I have suffered in sentenced to. along with a thirty seven thousand ~~and two hundred and twenty three~~ three dollar and twenty two cents awarded to my child Vickie Lambino for her worrying and emotional damage along with her prayers for my health and wellbeing and faith restored at the injuries suffered by his hands alone that she ~~once~~ felt the State and Georgia Department of corrections were responsible for providing families of incarcerated victims

Signed this 8th day of June, 2015.

X. Mr. Knight ~~ordered~~ to pay monthly the Brandon Ray Young whole sum of forty seven thousand two hundred twenty dollars and 51 cent also
STATE OF Georgia to the grandmother of the child Ms. Vicky Lambino.
COUNTY (CITY) OF Chattanooga for recovery of punitive damages.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED ON 6-9-2015
(Date)

Brandon Ray Young
Signature of Plaintiff

*If this ~~not~~ legibly written still suffers from memory loss, headaches and many other physical aches hips neck, spinal, knees and toes, Petitioner Suffers continuous pulsating throbbing loss of consciousness, and swelling at to say the least along with occasional chest pains. x x x

BY
a

BY

End of Complaint

BY
if